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September 18, 2021

VIA EMAIL AND ECF

Hon. Noel. L. Hillman
United States District Judge
U.S. District Court for the District of New Jersey
Mitchell H. Cohen Courthouse and Federal Building
One John F. Gerry Plaza
401 Cooper Street
Camden, NJ 08101

Re: Brown, et. al v. Warren, et al, 20-cv-7907 (NLH)
Status of Third Partial Interim Report

Dear Judge Hillman:

The purpose of this letter is to request a brief extension to file the Final Initial Report and Recommendation.

I have submitted two (2) Partial Initial Interim Reports and Recommendations pursuant to the Court's Order. The Court has entered a consent order and a Supplemental Order relating to the Second Partial Interim Report and Recommendation, and the Court is currently considering the First Partial Interim Report and Recommendation. The Court has granted two extensions for the Third Interim Report and Recommendation. Since the granting of the second continuance, there has been an outbreak of COVID-19 at the Cumberland County Jail, and my team and I have been working with the Jail to provide non-binding recommendations and advice. I have kept Plaintiffs' counsel regularly informed of the advice that my team and I have provided, and Plaintiffs' counsel and I conducted an unannounced inspection of the Jail on September 13, 2021. In addition, at the Court's request, I have reached out and initiated discussions between the N.J. Department of Corrections, the N.J. Governor's Office and the Jail concerning staffing and inmate population issues.

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My team and I have made significant progress in drafting the Third Initial Report and Recommendation. Given the recent COVID-19 outbreak, the developments in this case which have required my presence in Court, as well as the demands of my other cases, I respectfully request additional time to complete the Third Initial Report and Recommendation. Accordingly, I respectfully request an extension until October 15, 2021 to submit the Third Initial Report and Recommendation.

Please do not hesitate to contact me if you have any questions or concerns.

Respectfully submitted,

Porzio, Bromberg & Newman, P.C.

A handwritten signature in black ink, appearing to read "WILLIAM J. HUGHES, JR."

WILLIAM J. HUGHES, JR.

cc: Jeffrey M. Pollock, Esq.
Gregg L. Zeff, Esq.

WJH
Attachment